



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
SEATTLE DISTRICT, CORPS OF ENGINEERS
P.O. BOX 3755
SEATTLE, WASHINGTON 98124-3755

CENWS-PM-PL-ER

MAY 5 2005

Ms. Colleen Spiering
Bonneville Power Administration
Communications—DM-7
PO Box 14428
Portland, OR 97293

Subject: Kootenai River Ecosystems Project Preliminary EA


Dear Ms. Spiering:

Thank you for the opportunity to review the subject preliminary environmental assessment. We are among the entities involved with recovery of listed species in the Kootenai River, and of the Kootenai ecosystem. We support the effort you outline in your proposed action.

Enclosed are our comments on the EA. We hope you find them useful and constructive. If you have any questions, please contact Mr. Jeff Laufle of my section at 206-764-6578, or jeffrey.c.laufle@usace.army.mil.

Again, thank you very much.

Sincerely,


for Mark Ziminske
Chief, Environmental Resources Section

enclosure

US Army Corps of Engineers, Seattle District:
Comments on Preliminary Kootenai River Ecosystems Project Environmental Assessment

General: We support the goals and intent of this project.

General: There should be at least a short introduction in the EA itself, explaining that it is being prepared pursuant to NEPA.

Sec. 1.2, last para./bullets: It would seem useful to add the Kootenay Lake fertilization program as an example also; there seems no reason to exclude actions in the same basin as the proposed project. Also, some more background details about how nutrient additions work in rivers, and why artificial nitrification is considered useful despite its maintenance-intensive nature, would help the reader.

Sec. 1.3: Purpose statements seem well-crafted to bring out issues without preconceiving solutions.

Sec. 1.4: Not sure why Kootenay Lake fertilization has been left out of this list, particularly given its close relation to the proposed project. Suggest including it.

Sec. 1.4: Maybe also want to include VARQ alternative flood control, and sturgeon flow implementation, from Libby Dam.

Sec. 2.1: What reasons were expressed by the State of Montana for its request that no nutrient additions occur within its boundaries? Citation is a personal communication from a MDFWP biologist. Was that a formal letter? Did it reflect Montana DEQ's position? Was fertilization formally proposed to occur in Montana at any point? See also question re: Sec. 2.1.1.

Sec. 2.1.1: Is Montana's desire not to have nutrients added within its boundaries the basic reason for the project placement, or are there also technical reasons why the chosen location is preferred by the proponents?

Sec. 2.1.2, para. 2: Seems that 100 by 60 meters is pretty large for the project site, even with a truck turn-around. Are those figures correct?

Sec. 2.1.2, para. 4: Mentions reducing risk of fire. Does that account for any higher-level risks from forest fires in the immediate area?

Sec. 2.1.4: Can you confirm that the containment berms and liners around the tanks could capture the entire contents of a full tank in the unlikely event it should rupture? Narrative is not entirely clear on that.

Sec. 2.1.6, Adaptive Management: Are specific numerical criteria being set up to test hypotheses concerning effects of the action?

Sec. 2.4, and Sec. 3 (particularly 3.1.3 and 3.5.3): Effects of the no-action alternative need to be evaluated explicitly, alongside the effects of the preferred alternative. See CEQ regs (40 CFR

US Army Corps of Engineers, Seattle District:
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1500-1508), Sec. 1502.14, which calls for inclusion of the no-action alternative in the analysis. Table 2 and Sec. 3 indicate no impacts are expected from the no-action alternative. However, the fact that the no-action alternative is the status quo does not mean its impacts are zero. The impacts in this case would be the continuation of effects from a nutrient-poor situation—in other words, the negative effects that the project is proposed to address. The last cell in the third row of Table 3 actually acknowledges this with a sentence (“Current impacts to the Kootenai River ecosystem continue.”) which conflicts with the other sentence in that cell. Last cell in fourth row also acknowledges impacts of no action. Your general, introductory type narratives on the lack of nutrients in the river get at the heart of the impacts you are trying to address, so it’s a matter of expanding that to specific resource impact areas.

Sec. 2.4, Table 2: Suggest moving viewshed reference from Recreation row to Visual Resources row, within Proposed Action column.

Sec. 3.1: There is good discussion of impacts to sensitive, threatened and endangered species in subsections of this section, but nothing explicit about other fish species. Insects are mentioned in reference to their role as food for fish, but nothing more than that. Suggest a little more treatment of these if possible.

Sec. 3.1: Some restructuring appears necessary. Draft has:

- 3.1.1 Affected Environment
- 3.1.2 Impacts of the Proposed Action
- 3.1.3 Impacts of the No Action Alternative
- 3.1.4 Threatened and Endangered Species
- 3.1.5 Species of Special Concern
- 3.1.6 Cumulative Impacts

Secs. 3.1.4 and 3.1.5 contain information for each species that should go under 3.1.1 and 3.1.2 (as well as 3.1.3—see comment above on Sec. 2.4 and Sec. 3 regarding no-action alternative), rather than being at the same level as those sections. Or, you could make T&E spp. and Species of Special Concern their own section separate from Fish and Wildlife, but that leaves very little substance under Fish and Wildlife.

Sec. 3.1.1: Needs at least some specific mention of aquatic resources the project is supposed to benefit, besides the reference to T&E species in Sec. 3.1.4.

Sec. 3.1.2, para. 2: Good acknowledgement of possible unintended consequences.

Sec. 3.1.3 and subsequent references to impacts of no-action alternative: See comment for Sec. 2.4 concerning impacts of no-action alternative.

Sec. 3.1.4. No caps when writing names of white sturgeon, bald eagle. In subsection on grizzly bears, first paragraph, by “human fear” as a cause of bear decline, do you mean wanton killing of bears by fearful humans?

Sec. 3.1.5: First sentence under burbot, the words “endemic only” are redundant.

US Army Corps of Engineers, Seattle District:

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Sec. 3.5.2, first para.: States effective distance of treatment is downstream as far as Bonners Ferry. Is there any anticipated secondary effect further down, especially if fish populations increase and transport nutrients as far as Kootenay Lake? If so, what would be the possible effect of that in relation to fertilization going on in Kootenay Lake? (Transboundary effects should be analyzed if possible, according to CEQ.)

Sec. 3.5.2, Total Organic Carbon, 2nd para.: What northern rivers experienced a lag for invertebrates to increase? After what treatment?

Sec. 3.5.2, Total Organic Carbon, 2nd para.: Change ug/L to µg/L (in Word, it's in the Character Map). Same change for any other occurrences of that usage (such as in section about metals). Explain for public audience that it means micrograms per liter. In fact, a list of scientific abbreviations in or adjacent to the glossary would be useful for the general public, who are the target audience of this document.

Sec. 3.5.2, Metals: Good discussion of secondary effect from sources of phosphates.

Sec. 4.0: No mention of Clean Water Act? Is a Sec. 401 permit required?

Kootenai River Ecosystems Project
Preliminary EA

KRPEA-007

MAY 06 2005

I received your letter about the Kootenai river,
yes I agree something must be done to get the
quality of fish back into the river system.

I was raised at Bonners Ferry, Idaho. My grand-
parents came there in 1903 from Iowa. Their
names were J. J. Edwards & Harriet Sall Edwards.
Their homestead was where the 3 mile junction
of highway 2 & 95, north of Bonners Ferry.

I fished that river from the time I could walk
till I married & move away. My uncle is the
only man I know who fished that river & made
a living from it. He caught I think the biggest
sturgeon ever. Then the sturgeon was plentiful
as was the trout & whitefish. I swam that river & fished
on its banks. My grandmother was a full blood Cherokee
Indian, who valued the river system and what it gave
to us.

If what your plan will help the river & put fish
back into the system that are healthy then you
have my blessing, I still fish the river & enjoy it.

The river gives & it takes, but where can you go
& still see greenish blue water flowing away. I know
what the river can do. The dangers & the pleasures from
the river are what a person makes it. The river
demands respect.

Good luck to you

Luis Albert
P.O. Box 1403
Libby, MT. 59923

From the Desk of...

Date _____

Robert Petrusha

To: _____

Subject

KOOTENAI RIVER DEPLETED!

WHAT ABOUT THE KOOTENAI
NORTH THRU MONTANA TO
CANADA?!

IT HAS THE SAME "SICK"
WATER! DOESN'T IT WARRANT
THE SAME ATTENTION AND
CONCERN?

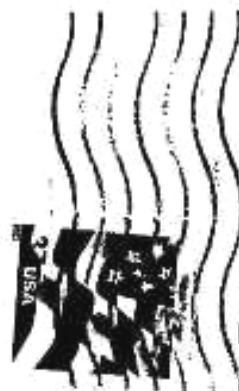
ARE YOU CATERING TO
MINORITIES —

PUT THE FEEDING STATION
AT THE LIBBY DAM AND
TAKE CARE OF THE WHOLE
PROBLEM!

Robert Petrusha

Robert A. Petrusha
551 Florence Rd.
Libby, Montana 59923

DM-73
B





wildidaho.org

Idaho Conservation League

PO Box 844, Boise, ID 83701 208.345.6933 Fax 208.344.0344

MAY 10 2005

KRPEA-00

BPA Communications Office
DM-7
PO Box 14428
Portland, OR
97293-4428

May 5, 2005

**RE: Idaho Conservation League comments on the Kootenai River Ecosystems
Project EA**

Dear BPA,

Thank you for the opportunity to comment on the Kootenai River Ecosystems Project EA. For thirty years, the Idaho Conservation League has worked to preserve Idaho's clean water, wilderness, and quality of life. For more information (or to become a member!), go to <http://www.wildidaho.org>. As Idaho's largest statewide conservation organization, we represent members from around the state -- many of whom have a deep personal interest in seeing our rivers restored to healthy and historic ecologic conditions. We firmly believe that healthy communities depend on healthy rivers.

As stated in our scoping comments, we believe that the focus on artificially enhancing nutrients is a short-term fix and that the DOE should focus on longer-term solutions that allow the restoration of natural nutrient cycling to the greatest extent possible. The DOE should consider other factors such as floodplain restoration, water quality improvements, and simulating historic stream flows. We were disappointed to find that our comments were only briefly mentioned in the preliminary EA and were not incorporated in the preliminary EA in a meaningful way. We encourage the DOE to fully address these concerns in the final EA.

We have attached our comments at the end of this letter. Please consider our original comments as well. Please keep us on the list to receive future documents related to this matter and feel free to contact me if you have any questions related to these comments.

Sincerely,

John Robison
Conservation Associate

Idaho Conservation League comments on the Kootenai River Ecosystems Project EA,

page 1 of 3

Idaho Conservation League scoping comments on the
Kootenai River Ecosystems Project

Purpose and need

As stated before, while increases in sport fishing may be desirable, the project should focus on restoring species at risk. The management objectives should support restoring or maintaining viable populations of white sturgeon, burbot, bull trout, and kokanee wherever feasible. As such, simply boosting nutrients may be insufficient and the agencies should consider other factors such as stream flows, timing, and water quality.

Historic conditions

While we support returning the river ecology towards historic conditions, the BPA needs to better define these conditions and the data used to support these findings. The BPA should describe historic nitrogen and phosphorus levels, current levels, and levels that would be achieved through this project. The historic timing and variability of these nutrient pulses should be analyzed as well. Presumably, nutrient levels also peaked following periodic wildfires. The BPA should compare the expected results of this project with historic results following wildfires. Perhaps an experimental prescribed burning component could even be included as part of this research project.

Limiting factors

The BPA should describe the limiting factors to white sturgeon, burbot, and bull trout and describe how this project addresses these concerns. If these limiting factors are not addressed, the BPA should add components to this project to address them.

Nutrient containment

We believe that the thick plastic liner underneath the holding tanks needs to be backed up with a clay, secondary containment liner as well as a leak detection and removal system. The proposed leak pump should have a backup alarm system with an independent power source. The transition box at the bottom needs to be large enough to accept spill from the storage tanks as well as any meteoric water.

Transition box

We are concerned that the mixing zone is still too large and may present a hazard to organisms. We believe that the DOE should consider diverting some water from the river into another transition box so that the released nutrients will already be partially diluted.

Nutrient ratio

The BPA needs to describe the ideal nitrogen-phosphorus ratios and how these ratios will be mixed and monitored.

Monitoring

We appreciate the fact that several variables will be monitored extensively. Monitoring reports should be made available to the public at several points throughout the year.

Nutrient sources still not defined

The BPA should describe the sources of the nitrogen and phosphorus used and the environmental impacts of producing it. BPA should obtain all nutrients from environmentally sensitive sources. Idaho's phosphate industry has experienced chronic problems with harmful selenium levels in surface and groundwater. Yellowstone cutthroat trout in some of these streams have been deemed hazardous to human consumption by the Idaho Department of Health and Welfare. It would be ironic for BPA to restore a fishery with a material that poisons another fishery in the process.

Impurities still a concern

Because phosphate often contains impurities such as selenium, we are concerned about how these impurities will be filtered out. If these impurities enter the river, the BPA needs to describe how the levels of each metal compare with historic and background levels.

Sustainability

The BPA needs to describe the sustainability of this nutrient enhancement project. The BPA needs to consider other options that may be more economically and ecologically sustainable in the long term.

Alternatives

As stated before, the BPA should consider restoring the floodplain of the Kootenai River as an integral component of this project. Restoring these riparian areas and adding seasonal high flow events from the Libby Dam will enable nutrients to enter the river system in a more sustainable and less artificial manner. Even if this floodplain restoration system adds only 5% of the nutrients as the artificial method, this amount could be increased gradually as more and more of the floodplain becomes restored. In addition, the floodplain restoration would have additional benefits to the ecological and human community through improved wildlife habitat, hunting, recreation, water quality, and flood control from side drainages.

Start

Because of the uncertainties involved, we recommend starting this project slowly and in a controlled manner before implementing this project at full scale. One option would be to start with tributaries with smaller flows. The BPA should include more details where this technology has been successfully used.

Habitat loss and degradation

The Idaho Department of Fish and Game should provide more details on how current dam operations affect quality, quantity and timing of flows and how these effects can be mitigated. Likewise, the effects of irrigation, agricultural runoff, industrial outflow, logging, mining, and grazing operations on water quality need to be assessed. The plan should utilize or establish TMDLs for specific tributaries within each river segment so that water quality improvements are quantifiable.